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10 Attorneys for Plaintiff
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12
13 IN THE UNITED STATES DISTRICT COURT
14
15 EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,

17 CASE NO. 2:20-cr-216 TLN

18 Plaintiff,

19
20 STIPULATION AND ORDER REGARDING
21 SENTENCING DATE AND PRESENTENCE
22 REPORT DISCLOSURE SCHEDULE

v.

23 KENNETH WINTON,

24 Defendant.

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26 1. On November 16, 2020, the United States filed an Information charging Winton with one
27 count of conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349. ECF 1. On December 3,
28 2020, Winton pled guilty to that charge. ECF 18.

1. This matter currently is set for sentencing on January 29, 2026. ECF 56.

2. Winton cooperated in a related case—*United States v. Piercey*, 2:20-cr-211 TLN.

3. Piercey's sentencing is scheduled for February 12, 2026.

4. By this stipulation, the parties request that Winton's sentencing be continued to a date
5. after Piercey's sentencing and that the presentence report disclosure schedule be adjusted accordingly.

6. Specifically, the parties jointly stipulate and request that this Court vacate the current
7. sentencing date and enter an order setting the following schedule for sentencing and disclosure of the
8. presentence report:

1 Judgment and sentencing: April 30, 2026, at 9:30 a.m.

2 Reply or statement of non-opposition: April 23, 2026

3 Formal objections: April 16, 2026

4 Final presentence report: April 9, 2026

5 Informal written objections: April 2, 2026

6 Updated draft presentence report (if needed): March 5, 2026

7 6. Senior U.S. Probation Officer Julie Besabe does not object to the proposed schedule.

8 IT IS SO STIPULATED.

9 Dated: December 11, 2025

10 ERIC GRANT
United States Attorney

11 /s/ MATTHEW THUESEN
12 MATTHEW THUESEN
13 Assistant United States Attorney

14 Dated: December 11, 2025

15 /s/ ADAM G. GASNER
16 ADAM G. GASNER
17 Counsel for Defendant
18 KENNETH WINTON

20 ORDER

21 IT IS SO ORDERED this 12th day of December 2025.

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26 TROY L. NUNLEY
27 CHIEF UNITED STATES DISTRICT JUDGE
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